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WM 20-541 JP
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KEKE LIBRON,

Docket No.:

Plaintiff,

-against-

NOTICE OF REMOVAL

PROLOGIS, INC. and PROLOGIS TARGETED U.S.
LOGISTICS FUND, L.P.,

Defendants.

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**TO THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK:**

Defendants, PROLOGIS, INC. and PROLOGIS TARGETED U.S. LOGISTICS
FUND, L.P., for the removal of this action from the Supreme Court of the State of New York,
County of BRONX, to the United States District Court for the SOUTHERN District of New York,
respectfully shows this Honorable Court:

FIRST: Defendants, PROLOGIS, INC. and PROLOGIS TARGETED U.S.
LOGISTICS FUND, L.P., are defendants in a Civil action brought against them in the Supreme
Court of the State of New York, County of BRONX, entitled:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
KEKE LIBRON,

Index No.: 34548/2020E

Plaintiff,

-against-

PROLOGIS, INC. and PROLOGIS TARGETED U.S.
LOGISTICS FUND, L.P.,

Defendants.
-----X

Copies of the Summons, the Complaint, and defendants' Answer are annexed hereto as Exhibit "A".

SECOND: That this action seeks recovery for damages sustained as a result of personal injuries allegedly suffered by the plaintiff.

THIRD: The grounds for removal are that this Court has original jurisdiction pursuant to 28 § 1332(a)(1). The amount in controversy exceeds the sum or value of \$75,000, exclusive of interests and costs, and is between citizens of different States. Annexed hereto as Exhibit "B" is defendants' Combined Discovery Demands. Annexed hereto as Exhibit "C" is plaintiff's response, received by this defendant on July 8, 2021.

FOURTH: The defendant, PROLOGIS, INC., is a Maryland corporation. Defendant, PROLOGIS TARGETED U.S. LOGISTICS FUND, L.P., is a Delaware limited partnership with a General Partner: Prologis, L.P., a Delaware limited partnership; Limited Partners: Prologis, L.P., a Delaware limited partnership, Prologis 2, L.P., a Delaware limited partnership, Prologis, a Maryland real estate investment trust, ProLogis Development Services LLC, a Delaware limited liability company, ProLogis Fraser, L.P., a Delaware limited partnership, PAC Operating Limited Partnership, a Delaware limited partnership, Prologis Park Moreno Valley Eucalyptus LLC, a Delaware limited liability company, Prologis Targeted U.S. Logistics REIT, Inc., a Maryland

corporation, and Prologis Targeted U.S. Logistics REIT II, Inc., a Maryland corporation.

FIFTH: That upon information and belief plaintiff is a citizen of the State of New York, County of BRONX.

SIXTH: In that this action is between citizens of different states and seeks damages in excess of \$75,000.00, than pursuant to 28 U.S.C.A. § 1332 and 28 U.S.C.A. § 1441 and § 1446 the case should be removed from the Supreme Court of the State of New York, County of BRONX to the United States District Court for the SOUTHERN District of New York.

Dated: Northport, New York
July 22, 2021

Yours, etc.

BRODY, O'CONNOR & O'CONNOR, ESQS.
Attorneys for Defendants

By: s/
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